

alistairnewbern

IN THE UNITED STATES DISTRICT COURT *Alistair E. Newbern*
FOR THE MIDDLE DISTRICT OF TENNESSEE U.S. Magistrate Judge
NASHVILLE DIVISION

CHELESY EASTEP, as surviving)
spouse and next of kin of LANDON)
DWAYNE EASTEP,)
Plaintiff,) No. 3:22-cv-00721
v.) Chief Judge Crenshaw
METROPOLITAN GOVERNMENT OF) Magistrate Judge Newbern
NASHVILLE AND DAVIDSON) JURY DEMAND
COUNTY, *et al.*,)
Defendants.)

JOINT MOTION FOR SECOND AGREED PROTECTIVE ORDER

The Parties respectfully request the Court to enter an agreed protective order to protect from disclosure any confidential information contained in the raw, unredacted body-worn and in-car camera footage depicting the response by the THP and Metro Nashville Defendants' respective law enforcement agencies to, and the individual Defendants' interactions with, Landon Eastep on January 27, 2022, to be provided by Defendants to Plaintiff for purposes of this litigation.

On April 18, 2023, the Court entered an Agreed Protective Order that governed the production of footage from THP Trooper Reggie Edge and Metro Nashville Officers Sean Williams, Jason Kidd, and Brian Murphy. (Doc. No. 71.) On September 15, 2023, the Court ordered that the Parties have access to all video footage, which will include footage not covered by the initial protective order. (Sept. 15, 2023, Minute Entry.) Accordingly, the Parties are requesting a Second Agreed Protective Order. A proposed agreed protective order is attached to this motion.

Respectfully submitted,

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METROPOLITAN GOVERNMENT OF
NASHVILLE AND DAVIDSON COUNTY
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing has been served via the Court's electronic filing system to:

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on this 22nd day of September 2023.

/s/ Michael R. Dohn
Michael R. Dohn